

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION, :
:
Plaintiff, : 07-CV-8383 (LAP/HP)
:
v. :
:
BLOOMBERG L.P., :
:
Defendant. :

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JILL PATRICOT, TANYS LANCASTER, :
JANET LOURES, MONICA PRESTIA, :
MARINA KUSHNIR and MARIA :
MANDALAKIS, :
:
Plaintiff-Intervenors, :
:
v. :
:
BLOOMBERG L.P., :
:
Defendant. :

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NOTICE OF MOTION BY DEFENDANT BLOOMBERG L.P. FOR SUMMARY
JUDGMENT ON ALL REMAINING SECTION 706 CLAIMS ASSERTED BY EEOC ON
BEHALF OF THE 32 NON-INTERVENING CLAIMANTS

PLEASE TAKE NOTICE THAT Defendant Bloomberg L.P. (“Bloomberg”), pursuant to Rule 56 of the Federal Rules of Civil Procedure and the Local and Individual Rules of this Court, and upon: (1) the Omnibus Memorandum of Law in Support of Bloomberg L.P.’s Motion for Summary Judgment on All Remaining Section 706 Claims Asserted by EEOC on Behalf of the 32 Non-Intervening Claimants; (2) Bloomberg L.P.’s Omnibus Rule 56.1 Statement of Material Facts in Support of its Motion for Summary Judgment on All Remaining Section 706 Claims

Asserted by EEOC on Behalf of the 32 Non-Intervening Claimants; (3) the Omnibus Declaration of Thomas H. Golden and exhibits thereto, and, (4) the Claimant-specific supplements and exhibits thereto, will move this Court, before the Honorable Loretta A. Preska, in the United States District Court, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on a date and time to be designated by the Court, for an order pursuant to Federal Rule of Civil Procedure 56 granting summary judgment to Defendant as to Plaintiff Equal Employment Opportunity Commission's discrimination claims asserted under Section 706 of Title VII of the Civil Rights Act, 42 U.S.C. Section 2000e-5, and the Pregnancy Discrimination Act, 42 U.S.C. Section 2000e(k), on behalf of the thirty-two individuals identified on schedule "A" to this notice. Defendant also requests such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, shall be served by Plaintiff no later than May 7, 2012, and any reply papers shall be served by Defendant no later than June 21, 2012, pursuant to the Court's Order dated January 12, 2012.

Dated: January 18, 2012
New York, NY

WILLKIE FARR & GALLAGHER LLP

7405313

By: _____ /s/
Thomas H. Golden (tgolden@willkie.com)
(A Member of the Firm)
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New York, New York 10019
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and

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Attorneys for Defendant Bloomberg L.P.

SCHEDULE "A" TO JANUARY 18, 2012 NOTICE OF MOTION IN
EEOC v. BLOOMBERG L.P., 07-CV-8383 (LAP/HP)

Alexander-Abraham, Tamika M
Barros, Marcia C.
Batcho-Lino, Stefanie
Cherpelis, Ekaterine
Cutrupi, Colleen
Dodd, Christina Orara
Fernandez, Sofia
Hewitt, Jandee Oh
Krishnamsetty, Meena
Maloney, Deirdre
Marcus, Renee
McElroy, Colleen M
McGonigle, Catherine
Munroe, Tannia
Neligan, Diane
Park, Hye Won
Pelkey, Meredith M
Picchi, Aimee E
Potosky, Jenna E
Rochford, Sharon
Saphir, Ann
Singer, Leah Harrison
Staiti, Christine
Sullivan, Jennifer
Talone Mannino, Cristina
Vannelli, Donna
Wagner, Caroline
Walsh, Juliann
Wrobel, Ketel
Zee, Samantha
Zhang, Ti
Zhu, Dana